IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

This document relates to:

03-MDL 1570 (RCC) ECF CASE

THOMAS BURNETT, et al,

03 CV 9849 (RCC)

AL BARAKA INVESTMENT & DEVELOPMENT CORP., et al.

THOMAS BURNETT, et al,

03 CV 5738 (RCC)

AL BARAKA INVESTMENT & DEVELOPMENT CORP., et al.

KATHLEEN ASHTON, et al,

02 CV 6977 (RCC)

AL QAEDA ISLAMIC ARMY, et al.

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STIPULATION AND ORDER OF SUBSTITUTION OF COUNSEL

IT IS HEREBY STIPULATED AND AGREED that Hunton & Williams LLP shall be and hereby is substituted for McDermott Will & Emery LLP as counsel for defendant Yassin Abdullah Kadi.

Dated: December 1, 2004

McDERMOTT WILL & EMERY LLP

Stanton D. Anderson (SA- 1511)

Thomas P. Steindler (TS-6620)

Former attorneys for defendant Yassin Abdullah Kadi 600 13th Street, N.W. Washington, DC 20005 (202) 756-8000

HUNTON & WILLIAMS LLP

By Joseph Saltaselli Joseph J. Saltarelli JS-1560

New attorneys for defendant Yassin Abdullah Kadi 200 Park Avenue, 43rd Floor New York, New York 10166-0136

AND

David F. Geneson (to be admitted pro hac vice)
Bonnie K. Arthur (to be admitted pro hac vice)
1900 K Street, NW
Washington, DC 20006
(202) 419-2063
barthur@hunton.com

U.S.D.J. / (2/20/04

SO ORDER

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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IN RE TERRORIST ATTACKS ON	:	
SEPTEMBER 11, 2001	:	
,	:	03-MDL 1570 (RCC)
This document relates to:	•	ECF CASE
This document relates to.		201 0.102
TIIOMAS BURNETT, et al,	•	
111011110 11011111111111111111111111111		03 CV 9849 (RCC)
v.	:	02 C 1 70 17 (NCC)
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AL BARAKA INVESTMENT &	•	
DEVELOPMENT CORP., et al.	•	
DEVELORIMENT CONT., true.	- X	
THOMAS BURNETT, et al,		
THOMAS BORGETT, et at,		03 CV 5738 (RCC)
v.	:	03 C V 3/30 (RCC)
••	;	
AL BARAKA INVESTMENT &	•	
DEVELOPMENT CORP., et al.	:	
DEVELOT WELVI CORT , at at.	X	
KATHLEEN ASHTON, et al,		
IMITELEN ASITION, or all,	:	02 CV 6977 (RCC)
ν.		02 C (0) ((((C C)
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AL QAEDA ISLAMIC ARMY, et al.		
AL QAEDA ISLAMIC ARMIT, et ut.	X	
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AFFIDAVIT OF JOSEPH J. SALTARELLI IN SUPPORT OF APPLICATION TO CHANGE COUNSEL PURSUANT TO LOCAL CIVIL RULE 1.4

STATE OF NEW YORK)	
)	ss.:
COUNTY OF NEW YORK)	

JOSEPH J. SALTARELLI, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and make this affidavit in support of defendant Yassin Abdullah Kadi's application, pursuant to Rule 1.4 of the Local Rules, to

substitute my firm, Hunton & Williams LLP, as counsel of record for Mr. Kadi in this action (the "Action") and replace outgoing counsel, McDermott Will & Emery ("MWE").

- 2. In connection with its being retained, our firm has consulted with MWE, and the status of the Action is as follows with respect to Mr. Kadi:
 - a. A motion to dismiss the Action was submitted to the Court on July 15, 2004;
 - b. Plaintiffs filed oppositions to Mr. Kadi's motion to dismiss on October 15, 2004 and November 8, 2004.
 - Mr. Kadi's response is due Friday December 3, 2004. Hunton & Williams c. will not be seeking an extension of time.
 - d. No trial date has yet been set in this matter.
- 3. It is not anticipated that the proposed substitution of counsel will delay the progress of this case.
- 4. Accordingly, we respectfully request that the proposed substitution of counsel be approved.

Sworn to before me this 2nd day of December, 2004

NIGERIA Q. ROLLING NOTARY PUBLIC, State Of New York No. 01R06055521 Qualified In Bronx County Commission Expires February 28, 200